

**If You Are a Medicare Part B Beneficiary  
or Heir of a Beneficiary Who Made, or is Obligated to Make  
a Co-Payment Through Medicare Part B For the Drugs,**

<b>Blenoxane</b> ( <i>bleomycin sulfate</i> )	<b>Remicade</b> ( <i>infliximab</i> )
<b>Cytosan</b> ( <i>cyclophosphamide</i> )	<b>Rubex</b> ( <i>doxorubicin hcl</i> )
<b>Etopophos</b> ( <i>etoposide phosphate</i> )	<b>Taxol</b> ( <i>paclitaxel</i> )
<b>Paraplatin</b> ( <i>carboplatin</i> )	<b>VePesid</b> ( <i>etoposide</i> )
<b>Procrit</b> ( <i>epoetin alfa</i> )	<b>Zoladex</b> ( <i>goserelin acetate</i> )

**Class Action Lawsuits May Affect Your Rights**

*The District Court has authorized this Notice. It is not a solicitation from a lawyer. You are not being sued.*

[Insert in Spanish: For More Information On This Lawsuit Visit [www.AWPLitigation.net](http://www.AWPLitigation.net) ]

- ® Lawsuits claim that certain drug companies reported false and inflated average wholesale prices (“AWP”) for certain types of outpatient drugs. AWP’s are used to set prescription drug prices that are paid by Medicare and consumers making Medicare Part B co-payments. The lawsuit asks the Court to award money damages to people who made Medicare Part B co-payments for the drugs. Defendants deny the claims asserted in the lawsuits.
- ® The Court has said that the lawsuits can go forward as class action lawsuits and has certified separate classes of people that made Medicare Part B co-payments for certain drugs made by each Defendant.
- ® The Classes consists of people who made co-payments for certain drugs (“Covered Drugs”) manufactured and marketed by Defendants AstraZeneca, Bristol-Myers Squibb Group and Johnson & Johnson Group. Certain dosages of the following Covered Drugs are included in the Classes: **Blenoxane** (bleomycin sulfate), **Cytosan** (cyclophosphamide), **Etopophos** (etoposide phosphate), **Paraplatin** (carboplatin), **Procrit** (epoetin alfa), **Remicade** (infliximab), **Rubex** (doxorubicin hcl), **Taxol** (paclitaxel), **VePesid** (etoposide) and **Zoladex** (goserelin acetate).
- ® The Court has said that the lawsuits can proceed on behalf of people who made Medicare Part B co-payments for Covered drugs between January 1, 1991 and January 1, 2005. See Questions 8 and 10 to see if you are a member of one or more of the Classes.
- ® A series of trials will determine whether the claims in this lawsuit against each Defendant listed above are true. There will be a separate trial for each Defendant. The first trial will

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begin on [Month Date,] 2006, with AstraZeneca.

® These lawsuits are not about the safety and effectiveness of these drugs.

This Notice explains what your rights and choices are as a member of the Classes. ***You must make a choice now regarding your rights. Please read all of this Notice carefully.***

## A SUMMARY OF YOUR RIGHTS AND CHOICES:

You May:		Due Date
<b>Remain in Lawsuit</b>	<p><b><i>Stay in the lawsuit and wait for the result.</i></b>            By doing nothing, you stay in the lawsuit and may share in any recovery, if there is one, but you give up the right to sue the Defendants yourself about the claims in the lawsuit. You will also be bound by the outcome of any trial.</p>	<p><b><u>Do Nothing</u></b></p>
<b>Exclude Yourself</b>	<p><b><i>Get out of the Classes.</i></b>            You can write and ask to get out of the lawsuit. If any money or benefits are awarded later in a trial or settlement, you will not get these benefits, but you keep the right to sue the drug companies on your own about the claims in the lawsuit. <b>See Questions 10 and 11.</b></p>	<p><b><u>Postmarked by</u></b>  <b>[Month Date,]</b>  <b>2006</b></p>
<b>Appear In The Lawsuit</b>	<p><b><i>Participate in the lawsuit on your own or through a lawyer.</i></b>            If you don't exclude yourself, you can appear and speak in the lawsuit on your own or through your own lawyer. (Class Counsel has been appointed to represent you) <b>See Questions 13 and 14.</b></p>	

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## BASIC INFORMATION

### 1. Why did I get this Notice?

Lawsuits have been filed against a number of drug companies on behalf of people who paid for one or more of the drugs – called “Covered Drugs” – see Question 9. You received this Notice because records obtained from the Centers for Medicare and Medicaid Services indicate that you may have made a co-payment for a Covered Drug between January 1, 1991 and January 1, 2005 or because you requested a copy of this Notice. If so, the lawsuit may affect you.

You have legal rights and choices to make before a series of trials will decide whether the claims being made against the Defendant drug companies on your behalf are true. There will be a separate trial against each Defendant. The first of the trials begins on [Month Date,] 2006. **You must make you choice whether to remain in the Classes or exclude yourself before [Month Date,] 2006.**

This Notice explains:

- What the lawsuits are about, and why they are class action lawsuits.
- What the lawsuits claim and what the drug companies say about the claims.
- Who is affected by the lawsuits.
- Who represents the class in the lawsuits.
- What your legal rights and choices are.
- How and by when you need to act.

### 2. What are these lawsuits about?

Plaintiffs allege Defendant drug companies either report the average wholesale price (“AWP”) of each drug they make to trade publications or provide those publications with information from which the publications calculate an AWP for each of Defendants’ drugs. The published AWP of a drug is used to set the price that consumers making Medicare Part B co-payments and Medicare will pay for the drug. The lawsuits claim that Medicare and consumers making Medicare Part B co-payments paid more than they should have paid for the Covered Drugs because drug companies intentionally reported false and inflated AWP’s concerning these drugs.

The Court in charge of the lawsuits is the United States District Court for the District of Massachusetts. The name of the lawsuit is *In re: Pharmaceutical Industry Average Wholesale Price Litigation*, Docket No. 01-CV-12257-PBS. The people who sued are called the Plaintiffs. The drug companies they sued are called the Defendants.

The lawsuits include 42 Defendants. At this time, the Court has certified separate Classes of people who made a Medicare Part B co-payments for Covered drugs manufactured by the Defendants listed below. The trials for each Defendant will also take place in the order listed below:

- AstraZeneca (which includes AstraZeneca Pharmaceuticals L.P.),
- The Bristol-Myers Squibb Group (which includes: Bristol-Myers Squibb Co.; Oncology Therapeutics Network Corp.; and Apothecon, Inc.), and

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- The Johnson & Johnson Group (which includes: Johnson & Johnson; Centocor, Inc.; Ortho Biotech Products, L.P.

Whenever you see the word “Defendants” in this Notice, it includes only the companies listed above: AstraZeneca, Bristol-Myers Squibb Group, and the Johnson & Johnson Group.

### **3. Why are these class actions?**

In a class action lawsuit, one or more people called “class representatives” sue on behalf of people who have similar claims. The people together are a “class” or “class members.” The court must determine if it will allow the lawsuit to proceed as a class action. If it does, a trial of the claims then decides the lawsuit for everyone in the class. The Court in this lawsuit certified a separate class of people who made Medicare Part B co-payments for drugs manufactured by each Defendant.

## **THE CLAIMS IN THE LAWSUITS**

### **4. What do the Plaintiffs claim?**

The Plaintiffs claim that the Defendants violated various state consumer protection laws because they intentionally provided false and inflated AWP's on certain types of outpatient drugs, including the Covered Drugs. The lawsuit also claims that the Defendants intentionally reported inflated AWP's with the knowledge that Medicare Part B relies on reported AWP's to determine the prices they will reimburse doctors for those drugs. The lawsuit says that as a result of the inflated AWP's, people who made co-payments under Medicare Part B paid more than they should have. The lawsuit asks the Court to award money damages to those people.

### **5. What do the Defendants say about the claims?**

The Defendants deny the factual allegations being made; contend that the lawsuits and damages are precluded under the law; contend that the alleged conduct, if proved, does not violate the 44 consumer protection laws, and that many class members will not be able to establish elements required by the consumer protection laws, or prove they paid a doctor for the subject drugs.

In addition, Bristol-Myers Squibb points out that it does not report AWP's; it reports list prices at which a substantial percentage of its sales are made. The Johnson & Johnson Group says that Plaintiffs did not calculate Johnson & Johnson's drug prices correctly and, when these errors are corrected, it is obvious that the published prices for Johnson & Johnson drugs were not inflated. The Johnson & Johnson Group points out that it did not give doctors discounts on the drug Remicade, and the small discounts it gave to doctors on the drug Procrit were disclosed. The Johnson & Johnson Group says its drugs are less expensive than competing therapies, so Class Members who received Johnson & Johnson's products saved money.

### **6. Has the Court decided who is right in the lawsuit?**

No. The Court hasn't decided who is right in the lawsuit yet. Much more must occur before the Court holds a trial, including notifying Class Members. By deciding now that the lawsuit can continue as a class action, the Court isn't saying who will win.

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## WHAT ARE THE CLASSES AND WHO ARE CLASS MEMBERS?

*To know if you're affected by this lawsuit, you first should determine if you're a member of one or more of the Classes.*

### 7. Am I a Member of one or more of the Classes?

You're a member of one or more of the Classes and part of this lawsuit if you are a resident of any state in the U.S. (except the states listed below), **and** between January 1, 1991 and January 1, 2005, you paid (or are currently obligated to pay) a co-payment under Medicare Part B for any of the Covered Drugs (listed in Question 9) that were manufactured and marketed by the Defendants. The Classes and the drugs involved in each class are as follows:

Defendant Classes	Subject Drug(s)
AstraZeneca Class	Zoladex (goserelin acetate)
Bristol-Myers Squibb Class	Blenoxane (bleomycin sulfate) Cytosan (cyclophosphamide) Etopophos (etoposide phosphate) Paraplatin (carboplatin) Rubex (doxorubicin hcl) Taxol (paclitaxel) VePesid (etoposide)
Johnson & Johnson Class	Remicade (infliximab) Procrit (epoetin alfa)

You are **not** a member of any of the Classes if you resided in Alabama, Alaska, Georgia, Iowa, Kentucky, Louisiana, Mississippi, Montana or Virginia at the time you made the Medicare Part B co-payment. The Court excluded persons residing in these states from the Classes because the consumer protection laws of those states don't allow class actions.

Stated in more detail, you are a member of one or more of the Classes if you fulfill the criteria listed in either 1, 2, or 3 below.

1. You are in one or more of the Classes (a) if you were a Medicare Part B beneficiary between January 1, 1991 and January 1, 2005, (b) who received one or more of the Covered Drugs during that time period in any state EXCEPT Alabama, Alaska, Georgia, Iowa, Kentucky, Louisiana, Mississippi, Montana, or Virginia, and (c) you paid your doctor for one or more of the drugs, but not if you paid a flat amount such as \$10 or \$20 per dose and not if you were fully reimbursed for your payment by a private insurer.

2. You are in one or more of the Classes if you are the legal heir of, or the legal successor to, the rights of a Medicare Part B beneficiary who met all three criteria set forth in "1" immediately above but who is now deceased. You need to consult your own lawyer to determine if you are the legal successor to any such rights. Your lawyer will help you determine whether you qualify as a "legal heir" under state laws of intestacy, will, trust, or any other applicable law.

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3. You are a member of one or more of the Classes if (a) you were a Medicare Part B beneficiary between January 1, 1991 and January 1, 2005, (b) who received one or more of the Covered Drugs during that time period in a state other than Alabama, Alaska, Georgia, Iowa, Kentucky, Louisiana, Mississippi, Montana, or Virginia, and (c) incurred a “legal obligation” to pay your doctor a co-payment for one or more of the drugs but did not do so. You may have incurred a “legal obligation” if (a) your doctor billed either you or your insurer for one or more of the drugs but neither you nor your insurer paid, or (b) if you did not pay because your doctor did not bill you, and (c) the time period for bringing a legal claim against you to enforce payment for one or more of the drugs has not already expired under the law.

**IMPORTANT:** This is not a bill or a collection notice. The Court is not suggesting, requesting or requiring that Medicare Part B beneficiaries who were billed for one or more of the aforementioned drugs but did not pay, or were not billed at all should pay their doctors now or that they are obligated to do so under the Medicare statute or regulations.

You are also not part of one or more of the Classes if:

- (a) You were fully reimbursed for the co-payment you made (for example, your MediGap or other private insurer reimbursed you the full amount); *or*
- (b) Your co-payment was a flat amount instead of a percentage of the total charge (for example, your MediGap or other private insurer paid for all of the co-payment except for a flat amount such as \$10 or \$20 that you had to pay). If your co-payment is a set dollar amount and does not differ with the price of the drug, your co-payment is a flat co-payment and not a percentage co-payment and you are not a member of one or more of the Classes.

#### **8. How do I know if my co-payment was under Medicare Part B?**

If you are 65 or older, or are younger than 65 but receive social security benefits because of a disability, you are entitled to Medicare benefits. Medicare Part A is the primary coverage for your health care costs when you are admitted as a patient in a hospital, and enrollment is generally automatic at age 65.

Medicare Part B helps to pay primarily for outpatient services such as care given in your doctor’s office, outpatient hospital care, and physical therapy. Medicare Part B also has a limited drug benefit. For drugs that are covered under Part B, Medicare pays 80% of the drug cost, and you are responsible for paying the other 20% (which is your co-payment).

Generally, the drugs covered under Medicare Part B are ones that are administered by your doctor, such as cancer treatment drugs that are given through injections or an IV. But Part B also covers some drugs that are self-administered (ones that you take yourself). Those include some oral anti-cancer drugs in pill form, some pills prescribed to help with nausea or anemia in connection with chemotherapy and drugs provided with some durable medical equipment, such as inhalation drugs used with a nebulizer (a compressed air machine).

Like Part A, Medicare Part B coverage is also automatic, but you have the option to decline it. You pay a monthly premium for Medicare Part B coverage (which is typically deducted from

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your social security check). You can tell if you're enrolled in Medicare Part B by looking at your Medicare insurance card. It will say if you are enrolled in Part B.

If you took one of the Covered Drugs when you were an inpatient in the hospital, you did not make a co-payment under Medicare Part B. However, if a Covered Drug was prescribed or administered by your doctor as a part of an outpatient treatment at a clinic, and you are enrolled in Medicare Part B, you may have been billed a co-payment of 20% of the drug cost if Medicare is your primary payer.

For the vast majority of people enrolled in Medicare, Medicare is the primary payer. Medicare is your secondary payer only if: (a) you or your spouse have continued to work after age 65 and have accepted the employer's health care insurance, or (b) you are a disabled person under 65 and have large group health plan coverage through your current job or the job of a family member. Unless either of these situations applies to you, your co-payment for a Covered Drug would have been under Medicare Part B.

## WHAT ARE THE COVERED DRUGS?

### 9. How can I tell if the drug I took is included as a Covered Drug?

Most, but not all, of the Covered Drugs are ones that a doctor administers to you in the form of an injection – either through a shot, an IV, or an implant beneath the skin. A few are drugs that you take yourself, such as the pill forms of Cytosan and VePesid – cancer therapy drugs. Most of the Covered Drugs are used for the treatment of various types of leukemia and cancers of the breast, ovaries, cervix, prostate, testes, lung, brain, and bone marrow. Other Covered Drugs are used to treat nausea or anemia resulting from cancer therapy, asthma, migraines, heart problems, leukemia, herpes, psychoses, or rheumatoid arthritis.

The Covered Drugs, by Defendant, are listed below:

#### AstraZeneca

*AstraZeneca, AstraZeneca Pharmaceuticals and AstraZeneca U.S.*

Drug Name	Treatment	Dosages
<b>Zoladex (goserelin acetate)</b>	Prostate and breast cancer; Endometriosis	<u>Implant</u> : 3.6mg <u>Injection (3 month)</u> : 10.8mg <u>Kit for injection</u> : 10.8mg syringe; 3.6mg syringe

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**Bristol-Myers Squibb Group***Bristol-Myers Squibb, Oncology Therapeutics Network and Apothecon*

<b>Drug Name</b>	<b>Treatment</b>	<b>Dosages</b>
<b>Blenoxane (bleomycin sulfate)</b>	Cancer of cervix and uterus, head and neck, or testicle and penile cancer; Hodgkin's disease	<u>Powder for Injection:</u> 15 Unit Vial; 30 Unit Vial
<b>Cytosan (cyclophosphamide)</b>	Cancer (primarily breast, ovarian); Leukemia; Nephrotic syndrome (kidney disease)	<u>Injection:</u> 100mg; 200 mg; 500mg; 1gm; 1x2gm;  <u>Lyophilized Injection:</u> 100mg; 200mg; 500mg <u>Powder for Injection:</u> 500mg; 1gm; 2gm <u>Tablets:</u> 25mg; 50 mg
<b>Etopophos (etoposide phosphate)</b>	Lung and testicular cancer; Cancer of the lymph glands; Leukemia	<u>Powder for Injection:</u> 100mg
<b>Paraplatin (carboplatin)</b>	Ovarian cancer	<u>Powder for Injection:</u> 50mg; 150mg; 450mg
<b>Rubex (doxorubicin hcl)</b>	Ovarian and breast cancer; Cancers of the bone, stomach, lung, bladder and thyroid; Leukemia	<u>Powder for Injection:</u> 10mg; 50mg; 100mg <u>Powder for Injection (Under Immunex label):</u> 10mg; 50mg; 100mg
<b>Taxol (paclitaxel)</b>	Ovarian and breast cancer; Lung cancer; Kaposi's sarcoma	<u>Injection:</u> 30mg; 30mg/5ml; 300mg/50ml <u>Injection Solution:</u> 100mg; 100mg/16.7ml
<b>VePesid (etoposide)</b>	Testicular cancer; Small cell lung cancer	<u>Injection Solution:</u> 100mg; 150mg; 500mg; 1gm <u>Capsules:</u> 500mg

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### Johnson & Johnson Group

*Johnson & Johnson, Centocor, Ortho Biotech, McNeil-PPC  
and Janssen Pharmaceutica Products*

Drug Name	Treatment	Dosages
<b>Remicade (infliximab)</b>	Rheumatoid arthritis; Crohn's disease; Ulcerative colitis	<u>Intravenous Injection</u> : 100 mg vial
<b>Procit (epoetin alfa)</b>	Anemia (especially anemia due to chemotherapy or HIV)	<u>Solution for Injection</u> : 2,000 Unit/ml; 3,000 Unit/ml; 4,000 Unit/ml; 10,000 Unit/ml; 20,000 Unit/ml; 40,000 Unit/ml

Please carefully review the list of Covered Drugs. If your doctor gave you or prescribed one or more of these drugs in the listed forms and dosages during the time periods listed in Questions 7 and 8 you might be a member of one or more of the Classes. To determine if you are a member of one or more of the Classes please read Question 7 and 8.

## **YOUR RIGHTS – GETTING OUT OF THE CLASS ACTION**

### **10. Can I get out of the lawsuit and the Classes?**

If you don't want to be in one or more of the Classes and you want to keep the right to sue the Defendants about the same claims on your own, you must take steps to get out of the Classes. This is called excluding yourself. By excluding yourself, you keep the right to file your own lawsuit or join another lawsuit against the Defendants about the claims in this lawsuit. You may exclude yourself from the litigation against one or more Defendants and remain in the litigation against the other Defendants. If you exclude yourself from the Classes, you will not be bound by the results of any of the trials against Defendants.

### **11. How do I exclude myself from the Classes?**

To exclude yourself from one or more of the Classes, you can (a) fill out and mail the attached opt-out form or (b) send a letter signed by you that includes all of the following:

- Your name, address, and telephone number;
- The name and number of the lawsuit: *In re: Pharmaceutical Industry Average Wholesale Price Litigation*, Docket No. 01-CV-12257-PBS;
- If you have hired your own lawyer, the name, address, and telephone number of your lawyer; and
- A statement that you want to be excluded from one or more (or all) of the Classes, specifying whether you wish to exclude yourself from the litigation against all Defendants or just some of the Defendants. If you wish to exclude

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yourself from the litigation against less than all Defendants you must specify which Defendants by name.

Your exclusion letter must be mailed first class, **postmarked on or before [Month Date,] 2006**, to:

AWP Litigation Administrator  
P.O. Box xxx  
City, State Zip code

Please remember that you can't exclude yourself by phone or by sending an email.

### **12. What happens if I exclude myself from the lawsuit?**

If you exclude yourself from one or more of the Classes, you will not get money or benefits from the Classes if any are obtained from a settlement or trial of the lawsuit involving the remaining Defendants. If you exclude yourself, you're no longer part of the Classes, and nothing that happens in the lawsuit affects you. But you can sue or be part of a different lawsuit against the Defendants about the claims in this case.

If you do not exclude yourself, you will be bound by the results in the lawsuit. Thus, if Defendants win, your claim will be extinguished. Defendants claim that the persons and entities representing your interests do not have a valid claim, and if that is correct, your claim will be extinguished unless you exclude yourself.

## **YOUR RIGHTS – APPEARING IN THE LAWSUIT**

### **13. Can I appear or speak in this lawsuit?**

As long as you don't exclude yourself, you can (but do not have to) participate and speak for yourself in this lawsuit through your own lawyer. This is called making an appearance. Remember that you may have to pay for the lawyer yourself. If you appear in the lawsuit, you are still a member of the Classes and can share in any benefits the Classes might receive as a result of settlement or a trial.

### **14. How do I appear in this lawsuit?**

If you want your own lawyer instead of Class Counsel to participate or speak for you in this lawsuit, your lawyer must give the Court a paper that is called a Notice of Appearance. The Notice of Appearance should include the name and number of the lawsuit, and state that you wish to enter an appearance in the lawsuit.

The Notice of Appearance must be filed with the Court at the following address:

Clerk of Court  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way, Suite 2300  
Boston, Massachusetts 02210

*Questions? Call toll free 1-800-000-0000, or visit [www.AWPlitigation.net](http://www.AWPlitigation.net).*

The Notice of Appearance must be filed using the following Civil Action Number:

01-CV-12257-PBS

Your Notice of Appearance should be filed with the Court before the beginning of the series of trials of each Defendant in this lawsuit. The first trial is currently scheduled to start on [Month Date], 2006.

## **IF YOU DO NOTHING**

### **15. What happens if I don't do anything at all?**

If you do nothing, you stay in one or more of the Classes. As a member of one or more Class, you will be bound by the results of one or more trials, whether those results are favorable or unfavorable to the Class, and you will not be able to sue any Defendant(s) on your own. Depending on the outcome of the Class trial or trials or other rulings by the Court, in the future Class Members may be asked to provide information regarding the drugs they paid for in order to claim a portion of any class recovery. You will receive further instructions at that time explaining what information you are required to furnish and where and when to send it if there is a recovery or settlement. There is no recovery or settlement at this time.

## **THE LAWYERS REPRESENTING YOU**

### **16. Do I have a lawyer in this lawsuit?**

Yes. The Court has appointed the following law firms to represent you and other Class Members:

Hagens Berman Sobol Shapiro LLP

[www.hagens-berman.com](http://www.hagens-berman.com)

1301 Fifth Avenue, Suite 2900  
Seattle, WA 98101

*and*

One Main Street, 4<sup>th</sup> Floor  
Cambridge, MA 02142

Mark H. Edelson

Edelson & Associates LLC

45 West Court Street  
Doylestown, PA 18901

Spector Roseman & Kodroff, PC

[www.srk-law.com](http://www.srk-law.com)

1818 Market Street, Suite 2500  
Philadelphia, PA 19103

Wexler Toriseva Wallace LLP

[www.wtwlaw.us](http://www.wtwlaw.us)

One North LaSalle St., Suite 2000  
Chicago, IL 60602

Kline & Specter, PC

[www.klinespecter.com](http://www.klinespecter.com)

The Nineteenth Floor  
1525 Locust Street  
Philadelphia, PA 19102

These lawyers are called Class Counsel. You won't be charged personally for these lawyers, but they will ask the Court to award them a fee to be paid out of any recovery. More information about Class Counsel and their experience is available at the Web sites listed above.

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**17. Can you elaborate on who pays the lawyers and how much will they be paid?**

If Class Counsel obtains money or benefits for the Class through a settlement or a successful trial, they will ask the Court for payment of attorneys' fees and expenses out of the total amount of money and benefits obtained. The Court must approve the amount of attorneys' fees and expenses. If Class Counsel doesn't obtain any money or benefits for the Class, they won't receive or ask to receive any attorneys' fees or reimbursement of expenses.

**18. Should I get my own lawyer?**

You don't need to hire your own lawyer, but if you want your own lawyer to speak for you or appear in Court, you must file a Notice of Appearance (*see* Question 14 to find out how to submit a Notice of Appearance). If you hire a lawyer to appear for you in the lawsuit, you will have to make your own arrangement for that lawyer's compensation.

## **GETTING MORE INFORMATION**

**19. Are more details and information available?**

This Notice is just a summary of the lawsuit. More details are in the Complaint filed by Class Counsel, and the other legal documents that have been filed with the Court in this lawsuit. You can look at and copy these legal documents at any time during regular office hours at the Office of the Clerk of Court, John Joseph Moakley U.S. Courthouse, 1 Courthouse Way, Suite 2300, Boston, Massachusetts 02210. Copies of some of the important documents, like the Complaint are also available on-line at [www.AWPlitigation.net](http://www.AWPlitigation.net).

In addition, if you have any questions about the lawsuit or this Notice, you may:

- Visit the AWP Litigation Web site at [www.AWPitigation.net](http://www.AWPitigation.net)
- Call toll free 1-xxx-xxx-xxxx (hearing impaired call 1-yyy-yyy-yyy)
- Write to: AWP Litigation Administrator, PO Box xxxx, City, State Zip code.

**20. How will I be notified about the outcome of the trials?**

Information about the trials will be posted on the Web site as appropriate. You may also register on the Web site or by mail to get notification of the outcome of the litigation and other significant occurrences associated with this case. To register by mail send a letter to the AWP Litigation Administrator at the address above. To register on the Web site, go to the site and access the "Registration" link on the Web site menu.

*By Order of the United States District Court, District of Massachusetts.*

Date: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Judge Patti B. Saris

***Questions? Call toll free 1-800-000-0000, or visit [www.AWPlitigation.net](http://www.AWPlitigation.net).***